

**Nevada Division of Environmental Protection  
Chemical Accident Prevention Program  
Element Audit Checklist**



<b>Facility:</b>	<b>Process(es) Covered:</b>	<b>Date:</b>	
<b>IX. VERIFICATION OF COMPLIANCE AUDITS PROGRAM</b>			
<b>A. PROCEDURE/POLICY REVIEW</b>			
<b>1) EXISTENCE, STRUCTURE AND FORMAT OF VERIFICATION OF COMPLIANCE AUDITS PROGRAM</b>		<b>NAC Ref.</b>	<b>Resp. Code</b>
Does the written Verification of Compliance Audits procedure and implementation records indicate that the audits are being conducted pursuant to CAPP requirements? (all requirements of sections 2 through 4 must be met)		459.95427	
Notes/Comments Pertaining to Responses to Questions under Issue 1):			
<b>2) CONDUCTING THE AUDIT</b>		<b>NAC Ref.</b>	<b>Resp. Code</b>
i. Does the program procedure require that the audit be conducted by at least one person that is knowledgeable in the process? ( <i>Is that individual or position specified?</i> )		459.95427(2)	
ii. Does the program procedure require that the audit be conducted at least once every three years?		459.95427(1a)	
iii. Does the program procedure require review of each of the following elements: ( <i>Does the procedure include some type of review criteria, who conducts the review for that element, and the acceptance criteria?</i> )		459.95427(1a)	
1. Process Safety Information pursuant to NAC 459.95412;		459.95427(1a)	
2. Process Hazard Analysis pursuant to NAC 459.95414;		459.95427(1a)	
3. Standard Operating Procedures pursuant to NAC 459.95416;		459.95427(1a)	
4. Training Program pursuant to NAC 459.95418;		459.95427(1a)	
5. Mechanical Integrity Program pursuant to NAC 459.95421;		459.95427(1a)	
6. Management of Change Program pursuant to NAC 459.95423;		459.95427(1a)	
7. Pre-startup Safety Review pursuant to NAC 459.95425;		459.95427(1a)	
8. Incident Investigation pursuant to NAC 459.95429;		459.95427(1a)	
9. Employee Participation pursuant to NAC 459.95431;		459.95427(1a)	
10. Hot Work Permit pursuant to NAC 459.95433;		459.95427(1a)	
11. Contractor Program pursuant to NAC 459.95435;		459.95427(1a)	
12. Emergency Response pursuant to NAC 459.9544 or 459.95442?		459.95427(1a)	



<b>Notes/Comments Pertaining to Responses to Questions under Issue 3):</b>		
<b>3) REPORT AND RECOMMENDATION TRACKING</b>	<b>NAC Ref.</b>	<b>Resp. Code</b>
i. Does the program procedure require that a report of findings be generated? <i>(Does the procedure indicate who generates the report?)</i>	459.95427(1b)	
ii. Does the program procedure require that recommendations to correct deficiencies be developed and documented? <i>(Does the procedure specify how recommendations are developed, how responsibility for implementation is assigned?)</i>	459.95427(1c)	
iii. Does the program procedure require that implementation of recommendations be documented? <i>(Does the procedure specify how implementation is tracked and by whom?)</i>	459.95427(1d)	
iv. Does the program procedure require that the two most recent reports be retained?	459.95427(1e)	
<b>Notes/Comments Pertaining to Responses to Questions under Issue 3):</b>		
<b>4) AUDIT IMPLEMENTATION</b>	<b>NAC Ref.</b>	<b>Resp. Code</b>
i. Has the most recent audit report been implemented in accordance with regulation? <b><i>refer to Part B</i></b>	459.95427	
ii. Have the two most recent reports been retained? <b><i>refer to Part B</i></b>	459.95427	
<b>Notes/Comments Pertaining to Responses to Questions under Issue 4):</b>		
<b>General Procedure/Policy Review Notes/Comments:</b>		



<b>B. ON-SITE INSPECTION - RECORDS AUDIT</b>						
<b>AUDIT THE MOST RECENT VERIFICATION OF COMPLIANCE REPORT</b> LIST THE LAST TWO REPORTS ON THE FOLLOWING TABLE:						
#	Subject Audit	Were there recommendations?	Are all the recommendations implemented?	Audit Start Date	Audit End Date	Report Date
i	Most Recent Report					
ii	Previous Report					
<b>Inquiry/Observation</b>						<b>Resp. Code:</b>
a. Does audit report indicate that a review was performed for:						
1. Process Safety Information;						
2. Process Hazard Analysis;						
3. Standard Operating Procedures;						
4. Training Program;						
5. Mechanical Integrity Program;						
6. Management Of Change Program;						
7. Pre-Startup Safety Review Program;						
8. Incident Investigation Program;						
9. Employee Participation Program;						
10. Hot Work Program;						
11. Contractor Program; and						
12. Emergency Response Program?						
b. Are persons who performed the audit identified? Is at least one knowledgeable in the process being audited?						
c. Does the report list deficiencies found during the audit?						
d. Are recommendations for correcting the deficiencies documented?						
e. Are the recommendations tracked through completion and are they being resolved 'promptly'?						
f. Was the audit performed within 3 years of the initial startup or the previous audit?						
g. Based upon the response codes used to complete items a through f above, is it possible to confirm that the contractor program is being implemented in accordance with the regulation?						
<b>Notes/Comments Pertaining to Responses to Questions:</b>						



**General On-Site Inspection and Records Audit Notes/Comments:**